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## REMARKS

With regard to the objection to the specification, applicant submits herewith a replacement page 5 which is clear and readable, and applicant posits apologies for original page 5 as filed, showing only a portion of the full page.

Claims 3 and 7, and the claims that depend therefrom, have been rejected under 35 U.S.C. 112, second paragraph, as being indefinite because “it is unclear if applicants are claiming two indicators per end of each string of different colors or just a single indicator per each end of the string.” Applicant respectfully requests reconsideration of this rejection in view of the following comments.

Claims 3 and 7 each include the phrase “each of said ends of said string having first and second different colored indicators located thereon, respectively.” Applicant respectfully submits that its use of the word “respectively” at the end of the phrase in question clearly defines the single string as having two ends, with one of the ends having a first color and the other end of the string having a second, different color. Applicant submits herewith a copy of page 1934 from Webster’s Third New International Dictionary, which includes a definition of the word “respectively” as “each in the order given,” and two specific examples of the proper use of the word “respectively” are also included in the dictionary definition. Thus, in view of the dictionary definition of the word “respectively”, applicant respectfully submits that the above-quoted phrase in claims 1 and 7 must properly be interpreted to mean that the string has two ends, with one of the ends having a first color indicator and the other end of the string having a second indicator which is different from the first. Moreover, since it is clear that the claims must be interpreted in light of the specification, and since there is no disclosure in the described embodiment of the present invention which has first and second color indicators on each of the two ends of the string, it is respectfully submitted that the interpretation of the phrase used in using the claim, as set forth above, is consistent with the disclosure of the preferred embodiment of the present invention in the specification.

Claim 9 has also been rejected under 35 U.S.C. 112, second paragraph, on essentially the same grounds as the rejections of claims 3 and 7, namely that it is “unclear if applicants are

claiming two indicators per end of each string of different colors or two indicators on one end of the string. Applicant respectfully request reconsideration of this rejection in view of the following comments.

First, it is noted that subsection “a” of claim 9 expressly defines the first step of the method as “placing two different color indicators on the length of string at predetermined locations along the length thereof”. It is respectfully submitted that this phrase can only be interpreted as a string that has only two different color indicators that are spaced from one another along the length of the same string, and it would therefore not be possible for this phrase to be interpreted as “claiming two indicators per end of each string” as set forth in the Official Action. Moreover, steps (d) and (e) must be read in light of the specific indication in subsection (a) as interpreted above, whereby the same string can only have two ends with one end having one color indicator and the other end having a different color indicator. Again, claim 9 must be interpreted in light of the specification, and as set forth in greater detail above, it is believed clear that steps (a) (d) and (e) are clear and definite in terms of what is disclosed in the specifications and drawings.

Accordingly, applicant respectfully requests that the rejection of claims 3, 7, and 9 as indefinite be withdrawn in view of the comments set forth above. If, however, the Examiner still believes these claims are indefinite notwithstanding applicant’s above explanation, applicant respectfully requests that the Examiner telephone applicant’s undersigned attorney to discuss these rejections and the possibility of overcoming the rejections.

Turning now to the rejection of claims 1, 2, 5 and 6 as being unpatentable over Collins U.S. Patent No. 2,624,957, either alone or in combination with Cohen U.S. Patent No. 5,110,296, claim 1 has now been amended, and it is respectfully submitted that claim 1, as amended, is clearly distinguishable from the basic Collins reference.

More specifically, one of the features of the present invention is that the holding member 16 is provided with first and second securing members 20, 22 which are positioned on the holding member 16 so that they are spaced apart from one another as best seen in Fig. 1 of the drawings. By virtue of the fact that the present invention includes two separate and distinct securing elements 20 and 22 and the fact that they are spaced apart from one another, the child

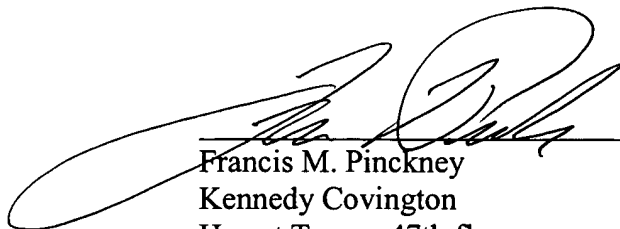
using the device of the present invention can attach one end 26' of the shoe string 26 to the holding member 16 using one of the securing elements 20, and the other end 26'' of the shoe string 26 can also simultaneously be attached to the holding member 16 by the other securing element 22, whereby the two ends of the shoe string can be arranged to cross one another and held in space to relationship to one another at the securing elements 20 and 22. Keeping in mind that the device of the present invention is intended to assist children in learning to tie a shoe string, and also keeping in mind that young children generally have only limited manual dexterity, the present invention permits a child to first attach one end of the string to one of the securing elements (see Fig 2), then cross the other end of the string over the first end so that it can be simultaneously attached at securing element 22 (see Fig 3), after which the child using the device can leave both ends of the string in that position while the child then manipulates the string to form the next step in forming the bow as illustrated in Fig 4. Accordingly, one of the significant features of the present invention is the fact that it provides two separate and distinct holding members that can hold two separate ends of a string simultaneously and in space relation to one another as part of the part of the process of manipulating the shoe string.

By contrast, the device illustrated and described in the Collins patent, when it is used to teach a child to form a bow as illustrated in Figs 8-10 of Collins, includes only a single holding member, mainly jaw 35, which holds both ends of the shoe string at exactly the same point, as best illustrated in Fig 9. Since there is only a single securing element in the Collins device, the manipulation of the shoe string by the child must necessarily follow a sequence of steps that are significantly different from the sequence of steps in the present invention as clearly defined in independent claim 1. More specifically, the sequence of steps permitted by the unique design of the present invention is more closely akin to the steps that are normally followed in tying a shoe string in the normal manner and without any assistance from a learning device.

To further emphasize one of the significant features of the claimed invention, claim 1 has been amended to state that there are "two separate and distinct" securing elements, with "each of said securing elements being" formed to temporarily hold "a different one of" said "two" ends of said string in place. Therefore, for reasons set forth above, it is believed that claim 1, as amended, clearly distinguishes the single jaw member of the Collins device, and applicant

therefore respectively request that claim 1 as amended, and the claims that depend therefrom, be allowed.

Respectively submitted.

A handwritten signature in black ink, appearing to read 'F. Pinckney', is written over a horizontal line.

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these steps the end 26' of the shoestring 26 will be referred to as the green string and the end 26'' of the shoestring 26 will be referred to as the red string:

1. Form an "X" by connecting the green string 26' to the green securing member 20 (see Fig. 2) and then connecting the red string 26'' to the red securing member 22 (see Fig. 3), preferably with the ends of both the red and green strings hanging over the back of the triangular holding member 16;
2. Move the end of the red string 26'' to the right to go through the front and bottom portion of the "X" (see Fig. 4);
3. Pull the ends of both strings to make the base of the bow (see Fig. 5);
4. Connect the green string 26' to the first green securing member 20 with the end portion hanging downwardly in front of the triangular piece (see Fig. 6);
5. Make one loop of the bow by holding between the thumb and index finger a length of the green string 26' that corresponds generally to the vertical height of the triangular holding member 16, and wrap the red string 26'' around the front of the green string 26' (over the thumb) to the back of the opening of the first loop in the green string 26' (see Fig. 7);
6. Form a second loop in the red string 26'' and push it through the loop in the green string 26' beneath the opposite cross-over portion of the red string 26''. For this step, the red string 26'' includes the third color-coded section 30 which identifies the portion of the red string 26'' that should be grasped in pushing it through the loop in the green string 26' (see Fig. 7); and
7. Pull the loops of both strings 26' and 26'' together to form the knotted bow (see Fig. 8).

[0024] One of the features of the present invention is the fact that the first and second securing members 20, 22 are utilized to temporarily hold the ends 26' and 26'' of the shoestring in their proper positions without any assistance from the child while the child is manipulating other portions of the shoestring as described above. Thus, the device of the present invention, and its method of use, provide a significantly improved arrangement for teaching children how to tie a bow in a shoestring.

[0025] For convenience in packaging the present invention, the post 12 can be removed from its hole in the base member 10, the rod 14 may be removable from the post 12, and the holding member 16 may be removable from the rod 14 so that all of these separate pieces can be packaged in a small container.

a breathing space or respite : REVIVE, *use* 3 a : BREATHE  
courage 2 *obs.* of the wind : BLOW 3 a : BREATHE  
: to inhale air into the lungs and exhale it from  
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